

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: CELESTE ANN WOMACK**

**CASE NO. 13-029957-EE**

---

**CELESTE ANN WOMACK**

**PLAINTIFF**

**V.**

**ADV. PROC. 18-00006-EE**

**TTLBL, LLC, ET AL.**

**DEFENDANTS**

**LIMITED ANSWER OF DEFENDANT TTLBL, LLC**

COMES NOW Defendant, TTLBL, LLC (“TTLBL”) and files its Limited Answer to the Adversary Complaint [Dk 1] as follows:

1. Admitted.
2. Admitted.
3. TTLBL does not have sufficient information to either admit or deny this allegation.
4. Admitted upon information and belief.
5. Admitted.
6. TTLBL does not have sufficient information to either admit or deny this allegation.
7. Without strict proof of the allegations made in Paragraph 7 fo the Adversary Complaint, TTLBL can neither admit nor deny said allegations.

With respect to the paragraph beginning “WHEREFORE,” and all remaining paragraphs in the Adversary Complaint, Defendant TTLBL denies all allegations made in said paragraphs.

WHEREFORE, having answered Plaintiff’s Adversary Complaint, Defendant TTLBL, LLC prays this Court will dismiss the Adversary Complaint in its entirety, with prejudice. Should this Court find in favor of Plaintiff with respect to the allegations made in the Adversary Complaint, Defendant further prays this Court grant TTLBL all taxes and fees it paid relating to or arising out of TTLBL’s tax sale purchase of the 2013 delinquent taxes on the subject parcel, including the 2014 ad valorem taxes thereafter redeemed by TTLBL, along with statutory interest accrued to date on all of the above. TTLBL further prays for any other relief to which it is entitled.

RESPECTFULLY SUBMITTED this 9<sup>th</sup> day of March 2018.

TTLBL, LLC

By: /s James Eldred Renfroe  
James Eldred Renfroe, Its Attorney

James Eldred Renfroe (MSB #10096)  
RENFROE & PERILLOUX, PLLC  
648 Lakeland East Drive, Suite A  
Flowood, MS 39232  
Telephone: 601-932-1011  
[jrenfroe@mslawfirm.biz](mailto:jrenfroe@mslawfirm.biz)

**CERTIFICATE OF SERVICE**

I certify that I have filed this day via the ECF online filing system, a true and correct copy of the foregoing document, which sent notification of filing to all counsel of record, including the U.S. Trustee and the Chapter 13 Trustee.

Dated: March 9, 2018.

/s James Eldred Renfroe